

Morgan, Lewis & Bockius LLP
1000 Louisiana Street
Suite 4000
Houston, TX 77002
Tel. +1.713.890.5000
Fax: +1.713.890.5001
www.morganlewis.com

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Morgan Lewis

Christopher B. Amandes
Partner
+1.713.890.5735
camandes@morganlewis.com

April 29, 2015

VIA FEDERAL EXPRESS

Mr. Robert Werner
Enforcement Officer (6SF-TE)
U. S. Environmental Protection Agency
Region 6
1445 Ross Avenue
Dallas, Texas 75202

**RE: United States Environmental Protection Agency General Notice Letter
CES Environmental Services Inc. Superfund Site in Harris County,
Houston, Texas---Arkema Inc. Response**

Dear Mr. Werner:

This is a response submitted on behalf of my client Arkema Inc. ("Arkema") to the United States Environmental Protection Agency's ("EPA") February 20, 2015 General Notice Letter ("GNL") for the CES Environmental Services Inc. Superfund Site ("the Site") in Houston, Harris County, Texas. Arkema received the GNL on March 3, 2015. This response is submitted within 60 days of receipt, as requested in the GNL. By this letter, Arkema is informing EPA that it would be willing to consider joining a sufficiently sized group of potentially responsible parties ("PRPs") for negotiations with EPA regarding possible performance and/or funding of cleanup activities at the Site to settle any potential liability under the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA").

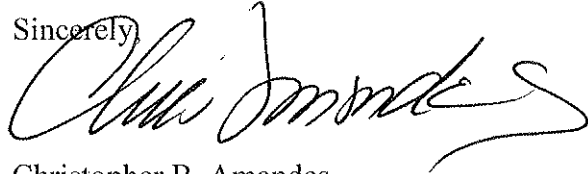
Nothing in this response is intended as an admission of fact or liability, nor of any share of liability, by Arkema for itself and its predecessor companies under any environmental laws or regulations. Also, Arkema, for itself and its predecessor companies, reserves, and does not waive, any and all rights, privileges and defenses that it may have in connection with this Site. Specifically, Arkema denies that it is a liable party under CERCLA, because its contractual arrangements with CES Environmental Services for the sale or other beneficial use of chemical products were not "arrangements for disposal" under the controlling United States Supreme Court case of *Burlington Northern & Santa Fe Railway Co. v. United States*, 556 U.S. 599 (2009). Furthermore, EPA has not provided any evidence and Arkema is not aware of any

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evidence that any of Arkema's (or any of its predecessor companies') chemical products were ever delivered to, disposed of, or otherwise came to be located at the Site.

Arkema reserves the right to amend or supplement this response, as appropriate, based on new or additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Amandes", with a stylized flourish at the end.

Christopher B. Amandes

c: Nancy Berenson, Arkema Inc.



Extremely

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